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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**THE PARTIES' JOINT REPORT
REGARDING SETTLEMENT
MEETING**

(Assigned to the Honorable David G.
Campbell)

1 In Case Management Order No. 38, the Court ordered the parties to “meet in person
2 and engage in good faith global settlement talks no later than November 30, 2018.” The
3 Court further directed the parties to “file a joint report informing the Court that good faith
4 settlement talks have been held and reporting generally on the outcome of such talks.” The
5 parties are therefore submitting this report in compliance with the Court’s order.

6 On Tuesday, November 13, 2018, the parties met in person in New York City, New
7 York. In attendance at that meeting were all members of the Plaintiffs’ Executive
8 Committee in this MDL: Ramon Lopez, Mark O’Connor, Russell Budd, Wendy
9 Fleischmann, Julia Reed Zaic, and Howard Nations. Attending on behalf of the Defendants
10 were lead MDL counsel Richard North, Greg Dadika (Associate General Counsel,
11 Litigation at Becton Dickinson and Company); and Russell Gaudreau from the law firm of
12 Greenberg Traurig, LLP, who has been retained by the Defendants as settlement counsel.

13 During that meeting, the parties discussed a number of topics impacting a potential
14 global resolution of the litigation, including the characteristics of the inventory of cases
15 presently pending and potential procedures for valuing those cases. The parties left the
16 meeting committed to collecting more detailed and comprehensive data concerning the
17 present inventory. The parties contemplate scheduling a follow-up meeting as soon as that
18 data collection is completed and anticipate that follow-up to occur within the next 30 days.

19 RESPECTFULLY SUBMITTED this 19th day of November, 2018.

20 BEUS GILBERT, PLLC

NELSON MULLINS RILEY &
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22 By: /s/ Mark O’Connor (with permission)

By: /s/ Richard B. North, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.